

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED
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U.S. DIST. COURT CLERK
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION
TROY, MI 48063

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 03-80810

v.

Honorable Gerald E. Rosen

D-1 AHMAD MUSA JEBRIL,
D-2 MUSA ABDALLAH JEBRIL,

Defendants.

05X70840

**SUBHIEH JEBRIL'S PETITION TO
ADJUDICATE THE VALIDITY OF
HER INTEREST IN
4637 PALMER, DEARBORN, MICHIGAN**

NOW COMES Petitioner, Subhieh Jebri, by and through her attorney, Jorin G. Rubin the following:

1. I am the wife of Musa Abdallah Jebri. We were married in 1964 and are still married to this day.
2. On November 25, 1983, my husband and I purchased the property located at 4637 Palmer, Dearborn, Michigan for \$42,000 (hereinafter the "subject property"). We received a warranty deed related to the subject property.
3. My interest in the subject property is based on the fact that the title is in my name with my husband. Under Michigan law, my husband and I own the subject property as tenants by the entireties which prevents its forfeiture. See *U.S. v. 2525 Leroy Lane*, 910 F. 2d 343 (6th Cir. 1990), *cert. denied*, 111 S.Ct. 1414 (1991).

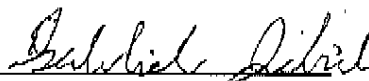
4. I do not know of any acts conducted by the Defendants that would give rise to the forfeiture of the subject property.

5. Based on my ownership interest in the subject property, the property cannot be forfeited to the government.

6. Pursuant to 21 U.S.C. §853(n)(6)(A) and (B), I have a legal right, title and/or interest recognized by law that is superior to that of the Defendants at the time the alleged commission of the acts occurred which gave rise to this forfeiture and I am a bona fide purchaser of the subject property without reason to believe that the property was subject to forfeiture.

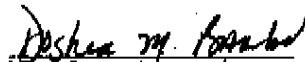
WHEREFORE, Petitioner, Subheih Jebril, seeks to have her ownership interest in the subject property adjudicated by the Courts and have the forfeiture action against this property dismissed in its entirety.

I declare, under penalty of perjury, that the facts contained in this Petition are true to the best of my ability and information.



Subheih Jebril

Subscribed and sworn to before me on

this 3 day of March, 2005.


Notary Public, Wayne County
My commission expires 4-2-11
DOUGLAS G. GIBBS
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES 4-2-11
RESIDING IN COUNTY OF Wayne

Respectfully submitted,


Jorin G. Rubin (P60867)
Law Office of Jorin G. Rubin, PC
Attorney for Plaintiff
26711 Northwestern Hwy, Suite 200
Southfield, MI 48034
(248) 799-9100

Dated: March 3, 2005